

In the Matter of)
)
Modification of the Universal Licensing)
System to allow TV pickup stations and) RM -11308
remote pickup stations to document the)
locations and heights of their receive-only)
sites)

To: The Commission

The National Association of Broadcasters (“NAB”)¹ submits these comments in response to the Commission’s *Public Notice*.² On September 6, 2005, the Society for Broadcast Engineers (“SBE”) filed a Petition for Rulemaking seeking to amend the Commission’s Rules³ to modify the Universal Licensing System (“ULS”) to allow TV pickup and remote pickup licensees to provide the locations and heights of their receive-

³ In the Matter Modification of the Universal Licensing System to allow TV pickup stations and remote pickup stations to document the locations and heights of their receive-only sites, Society of Broadcast Engineers, *Petition for Rulemaking*, Sept. 6, 2005 (“*Petition*”).

only sites. NAB supports this *Petition* and urges the Commission to promptly issue a rulemaking.

TV Pickup Receive sites, also known as Electronic News Gathering Receive-Only (“ENG-RO”) sites, are the lifeline by which breaking news is supplied to a station from ENG trucks on location. ENG-RO sites operate as relays between the truck and the station, and any interference that breaks the chain between the ENG trucks and the station could inhibit a station’s ability to immediately report breaking news, including critical, life saving emergency information. For this reason, ENG-RO sites must be protected.

Currently, licensees cannot document the height and location of their receive-only sites in the ULS. The TV Broadcast Auxiliary Service (“BAS”) bands on which ENG channels are located are bracketed by allocations allowing high-power terrestrial base stations, including Personal Communications Service (“PCS”) and Third-Generation (“3G”) base stations. These high-powered stations, if sufficiently close, may interfere with relatively sensitive ENG-RO sites and render the ENG-RO sites useless. Currently, new entrants on the adjacent bands cannot search the ULS to discover the locations of ENG-RO sites before placing new base stations. If, however, licensees were allowed to document the location of their sites using the ULS, the new entrants on the adjacent band would be alerted to their location and could either move their proposed station or, at the very least, install filters to limit the interference. NAB agrees with the SBE that most PCS/3G licensees would search the ULS for ENG-RO sites within the immediate vicinity of any proposed base station. *See Petition* at 3. This simple modification to the ULS would help assure coordination between the ENG-RO licensees and new entrants on adjacent spectrum allocations.

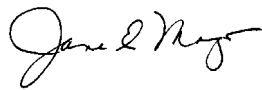
Further, the Commission is presented here with a prime opportunity to facilitate frequency coordination. As part of the transition to the 2 GHz broadcast auxiliary band, over the next few years, all TV pickup licensees are required to file FCC Form 601 with the Commission specifying, in part, the technical parameters of their facilities.⁴ Including additional data associated with this filing is readily feasible. The Commission should therefore amend Form 601 so that licensees may provide, on a voluntary basis, additional data on their ENG-RO sites. This solution would provide interested parties the much-needed ability to search the ULS and avoid interference with ENG-RO sites.

For the above-stated reasons, NAB supports SBE's *Petition* and urges the Commission to expeditiously move this matter into a rulemaking proceeding.

Respectively submitted,

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⁴ See In the Matter of Improving Public Safety Communications in the 800 MHz Band, WT Docket No. 02-55, *Fifth Report and Order, Fourth Memorandum Opinion and Order*, 19 FCC Rcd 14969 (2004).

CERTIFICATE OF SERVICE

I, Joan Flowers, Legal Secretary for the National Association of Broadcasters, hereby certify that a true and correct copy of the foregoing Comments of the National Association of Broadcasters was sent the 23rd day of February 2006, by first-class mail, postage prepaid, to the following:

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